December 17, 1970

Mr. F. M. Hoppe
Director of Public Utilities
State of Michigan
Seven Story State Office Bldg.
Lansing, Michigan 48913

Dear Mr. Hoppe:

This is in reply to your letter of November 3, 1970, your file OX-DOT, requesting interpretations of certain section of 49 CFR, Part 192. We have already furnished the requested interpretation explaining the relationship between Sections 192.555(d)(2) and 192.619(a)(3), in our letter of November 3, which must have crossed your letter. The other interpretations requested follow:

Question: Subpart d - Design of Pipeline Components Section 192.179 (b)(1) and (c) - Transmission line valves. As worded, these sections would appear to prohibit buried valves.

Answer: Section 192.179(b)(1) and (c) is taken directly from paragraph 846.21(b) and (c) of the B31.8 Code (1968), and does not prohibit buried valves. The intent is that these valves be installed in such a manner that they can be operated by authorized personnel in an emergency with a minimum of time delay.

Question: Section 192.197(a) - Control of Gas Pressure. It appears this section is applicable if the service line pressure is 59 psig or less.

Answer: Section 192.197(a) applies if the pressure is 60 psig or less, as in paragraph 845.51 of the B31.8 Code (1968). The word "under" was included erroneously and was deleted by an amendment to this section.

Question: Section 192.197(c)(4) - Control of Gas Pressure. This section appears to negate the provisions of 192.197(c)(3). Location of the shut off device on the upstream side of the service regulator could impose more than 125 psig on the upstream side of the regulator when the device is in the open position. Location of the device on the downstream side of the service regulator could impose high pressure (more than 60 psig) on the downstream side of the regulator when the device is closed.

Answer: Section 192.197(c()(4) - This question is the same as was asked in your letter of October 4, 1970, and was answered by our letter of November 3, 1970.

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Question: Section 192-273 - Joining of Materials Other Than by Welding. (b) Does this mean the operating company must provide specific written procedures, for each type of joint and/or device utilized for joining, or will manufacturer's technical literature be sufficient?

Answer: Section 192.273(b) - does mean that each company must provide specific written procedures for each type of joint and device utilized for joining. Instructions from manufacturer's technical literature may be used but the written procedures must be followed, and not merely available.

Question: (c) Is a pressure test of the completed facility adequate inspection, or does this mean each separate joint must be inspected?

Answer: Section 192.273 (c) is not satisfied by a pressure test of the completed facility alone. The section does not specify by whom or how the inspection is to be made, Some examples would be:

1. A pipe fitter installing a domestic meter set should make certain that each type of joint used was made up in a proper manner. A soap bubble test would also be appropriate.

2. A crew supervisor installing a line valve should inspect the installation to make sure the valve is operable, and if flanges are used, that they are made up with proper gaskets and bolts, and the bolts ar properly installed and tightened.

Question: Section 192.359 Customer Meters - (a) What is the manufacturer's shell test pressure? Present literature only provides the m.o.p. of the case.

Answer: Section 192.359 Customer Meters - A check was made with meter manufacturers and it was ascertained that most manufacturers were already testing their hard case meters to 1.5 X M.O.P or more, and that this requirement would create no hardship on the few manufacturers who were not already doing so. However, the purchaser should require the manufacturer to certify that a proper test was made to qualify the M.O.P.

Question: Section 192.607 - Initial Determination of Class Location and Confirmation. How does OPS expect to determine compliance with these requirements. Do the operating companies need to file reports to regulatory agencies depicting compliance, or is this determination to be accomplished through staff inspections at some later date?

Answer: Operating companies should conduct the appropriate surveys and maintain adequate records to indicate the class location and operating stress level for each segment of the pipeline. The complete study need not be filed with OPS, but should be available on request. State agencies may have different requirements relating to this matter for intrastate lines.

Question: Section 192.515(d) Emergency Plans. How does OPS expect to interpret compliance? What specifically does OPS intend to be included in such programs?

Answer: Section 192.615(d) Emergency Plans. In establishing an education program to enable customers and the general public to recognize and report gas emergencies. the requirements for a transmission company would be different from those of a distribution system. What is intended is that those who live near gas facilities or use gas have some knowledge of how to recognize a possible gas emergency and what authorities to notify promptly. A small booklet entitled "Control of Natural Gas in Emergency" published by the Southern Gas Association, 924 Life Building, Dallas Texas 75202 is a good example of what might be done is a distribution company. Since requirements will vary in each case the operator is free to develop a program to meet the individual situation.

Question: Section 192.619 - Maximum Allowable Operating Pressure -Refer to question on Section 192.555 (d) (2).

Answer: Section 192.619 sets limits of operating pressures based on the test pressures to which a line has been subjected. Section 192.555(d)(2) is an exception that applies only in a Class I location, and permits increasing the operating pressure on a line if certain other criteria are not (but only to 80 percent of what would be allowed for a new line.) In a Class I location, operation of a new line is permitted up to 72% of SMYS, and therefore, a line uprated under Section 192.555(d)(2) would be limited to 72% SMYS X 80%, or 57.6% of SMYS.

Question: Section 192.625 - Odorization of Gas. (f) What is OPS meaning of "periodic sampling"?

Answer: In Section 192.625(f), the term "periodic sampling" is used instead of requiring a specific amount of time between tests, because each system will have different requirements. For example, where gas flow is low, the odorant may intend to drop out of the gas stream and especially on a new system, the odorant may tend to be absorbed, on the inside surface until the pipe wall becomes saturated. Because of these conditions,odorant sampling should be done more often in such situations than in systems operating under normal conditions. The operator must sample as often as experience indicated the need, to assure proper odorant level.

Question: Section 192.711(a)(2) and (b) - Transmission Lines; Repair Procedures. Do these apply to only the +40% SMYS implied in Section 192.711(a)(1), or do they apply to all transmission lines as defined in OPS Code which is ÷20% SMYS?

Answer: Section 192.711 is a rewording of paragraph 851.7 of the B31.8 Code (1968). It applies to lines operating at or above 40% of SMYS only.

Sincerely,

/signed/

Joseph C. Caldwell
Director, Acting
Office of Pipeline Safety

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